

BEFORE THE CALIFORNIA ENERGY COMMISSION

California Energy Commission

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**COMMENTS OF
SUSTAINABLE CONSERVATION
ON SECOND TRIENNIAL INVESTMENT PLAN FOR
ELECTRIC PROGRAM INVESTMENT CHARGE
(DOCKET NO. 12-EPIC-01)**

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For SUSTAINABLE CONSERVATION

February 13, 2014

As directed in the Notice for the February 7, 2014 workshop on the Second Triennial Investment Plan for the Electric Program Investment Charge (“EPIC”) Program, Sustainable Conservation submits this brief comment to the California Energy Commission (“CEC”). Sustainable Conservation has a particular interest in biogas technology, the development of which could be very beneficial for both California’s agriculture and food processing industries and California’s environment. Sustainable Conservation has regularly provided input to the CEC on actions the CEC can take to facilitate bringing this important technology to market.

Sustainable Conservation notes with interest the reference in the CEC’s presentation for the February 7 workshop to a potential programmatic Environmental Impact Report for biomass funded by EPIC. Sustainable Conservation is supportive of this idea, so long as “biomass” is defined to include dairy digesters, not just forestry byproducts. As the CEC is aware, there is legislative attention on how the biomass industry, including dairy farmers, can be stimulated so biomass is able to offer renewable electricity to California’s ratepayer. The California Public Utilities Commission (“CPUC”) is in the midst of deliberations to implement SB 1122, which directed the CPUC to develop terms under which utilities must purchase up to 250 MW of biomass energy from several categories, including dairy. A programmatic EIR could be useful in more quickly bringing these projects online.

The CEC is also likely aware of ongoing efforts to develop an interagency consolidated permit process for biogas digesters. Sustainable Conservation has been active in that process. We encourage the CEC to work with the Governor’s Office of Business and Economic Development (aka “GO-Biz”) to get that process up and running to expedite permitting of digesters. The CEC may find it is appropriate to use EPIC funds to facilitate the consolidated permit process.

Sustainable Conservation appreciates the acknowledgement that biomass is an area of potential investment for EPIC, and encourages the CEC to do its utmost to use EPIC to facilitate the greater deployment of this technology, particularly dairy biogas.